

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No.19-CR-151

v.

FRANCISCO MARTINEZ,

Defendant.

**MOTION TO EXTEND THE TIME FOR FILING PRETRIAL MOTIONS AND
SUPPORTING AFFIDAVITS**

Francisco Martinez, by counsel, Edward J. Hunt, moves the Court for entry of an order extending the time for filing pretrial motions and supporting affidavits in this case until Monday, March 2, 2020, for the reasons set forth below.

1. This Court previously set a deadline for filing pre-trial motions until February 28, 2020. Counsel has been working diligently on this case. The discovery is voluminous and the issues complex.

2. On today's date, counsel for the defendant , after conferring with Assistant United States Attorney William J. Roach, is filing four pretrial motions — a motion for a bill of particulars, a motion for early disclosure of exculpatory and impeachment materials, a motion to suppress evidence arising out of a traffic stop in Mohave, County, Arizona and a motion to suppress evidence arising out of a traffic stop in Fond du Lac County, Wisconsin.

3. Counsel had intended to meet with the client today in order to do a final review of the motions, affidavits and to discuss one last pretrial motion issue with the defendant. Counsel had hoped to do so late this afternoon or this evening. However, because counsel was in Madison, Wisconsin in the morning on a case and did not return to Milwaukee till the afternoon to work on final drafting, research and revision of the motions he files today, he was not able to travel to the Brown County Jail in time to visit with the client before the jail professional visitation hours ended this evening.

4. Counsel conferred with AUSA Roach and informed him that he may be requesting an extension of time until Monday, March 2, 2020. AUSA Roach has no objection to extending the deadline for filing motions along with any supporting affidavits, until March 2, 2020.

Accordingly Francisco Martinez asks the Court for entry of an order extending the time for filing pretrial motions and any supporting affidavits in this case until Monday, March 2, 2020

Dated at Milwaukee, Wisconsin, this 28, February, 2020.

Respectfully submitted,

/s/Edward J. Hunt

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